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[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Trina L. Downs

(Enter above the full name
of the plaintiff or plaintiffs in
this action)

vs.

Case No: 1:19-cv-07266
(To be supplied by the Clerk of this Court)

Village of Dolton

Elizabeth Scott

Janice Johnson

Sonye London

Riley Rogers

(Enter above the full name of ALL
defendants in this action. Do not
use "et al.")

⁰²
FILED

JAN 29 2020

THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

CHECK ONE ONLY:

AMENDED COMPLAINT

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**COMPLAINT UNDER THE CIVIL RIGHTS ACT, TITLE 42 SECTION 1983
U.S. Code (state, county, or municipal defendants)**

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**COMPLAINT UNDER THE CONSTITUTION ("BIVENS" ACTION), TITLE
28 SECTION 1331 U.S. Code (federal defendants)**

☐

OTHER (cite statute, if known)

**BEFORE FILLING OUT THIS COMPLAINT, PLEASE REFER TO "INSTRUCTIONS FOR
FILING." FOLLOW THESE INSTRUCTIONS CAREFULLY.**

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

I. Plaintiff(s):

- A. Name: Trina L. Downs
- B. List all aliases: none
- C. Prisoner identification number: n/a
- D. Place of present confinement: n/a
- E. Address: 15101 Grant Street, Dolton, IL 60419

(If there is more than one plaintiff, then each plaintiff must list his or her name, aliases, I.D. number, place of confinement, and current address according to the above format on a separate sheet of paper.)

II. Defendant(s):

(In **A** below, place the full name of the first defendant in the first blank, his or her official position in the second blank, and his or her place of employment in the third blank. Space for two additional defendants is provided in **B** and **C**.)

- A. Defendant: Elizabeth Scott
 Title: Village of Dolton, Village Administrator
 Place of Employment: Village of Dolton
- B. Defendant: Janice Johnson
 Title: Director of Administrative Services
 Place of Employment: Village of Dolton
- C. Defendant: Sonye London
 Title: Director Water Department
 Place of Employment: Village of Dolton

(If you have more than three defendants, then all additional defendants must be listed according to the above format on a separate sheet of paper.)

II. Defendants contd.

D. Defendant: Riley Rogers

Title: Mayor Village of Dalton

Place of Employment: Village of Dalton

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

III. List ALL lawsuits you (and your co-plaintiffs, if any) have filed in any state or federal court in the United States:

- A. Name of case and docket number: Downs vs. Village of
Dolton 19cv7266
- B. Approximate date of filing lawsuit: November 4, 2019
- C. List all plaintiffs (if you had co-plaintiffs), including any aliases: Trina L. Downs
- D. List all defendants: Elizabeth Scott, Janice Johnson,
Sonye London, Riley Rogers, Village of Dolton
- E. Court in which the lawsuit was filed (if federal court, name the district; if state court, name the county): Northern District of Illinois, East Division
- F. Name of judge to whom case was assigned: Judge Pacold
- G. Basic claim made: violation of Constitutional right
to due process violation of civil rights
- H. Disposition of this case (for example: Was the case dismissed? Was it appealed? Is it still pending?): Still pending
- I. Approximate date of disposition: next hearing 2/10/2020
unknown disposition date

IF YOU HAVE FILED MORE THAN ONE LAWSUIT, THEN YOU MUST DESCRIBE THE ADDITIONAL LAWSUITS ON ANOTHER PIECE OF PAPER, USING THIS SAME FORMAT. REGARDLESS OF HOW MANY CASES YOU HAVE PREVIOUSLY FILED, YOU WILL NOT BE EXCUSED FROM FILLING OUT THIS SECTION COMPLETELY, AND FAILURE TO DO SO MAY RESULT IN DISMISSAL OF YOUR CASE. CO-PLAINTIFFS MUST ALSO LIST ALL CASES THEY HAVE FILED.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

IV. Statement of Claim:

State here as briefly as possible the facts of your case. Describe how each defendant is involved, including names, dates, and places. **Do not give any legal arguments or cite any cases or statutes.** If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

The Village of Dolton has fraudulently billed my residence since the first bill on 4/2012. Charging me from a \$2420.16 balance that had nothing to do with my account and continued to do so until I paid a fraudulent balance in full with a credit of \$23.28. I began speaking out publicly against the Village of Dolton fraudulent billing practices. As time continued other Village of Dolton water corruption was exposed like the amount of approximately 8 million owed for water to the City of Chicago and 3 million owed to Home and Disposal. On 9/16/2019 I attended the Village of Dolton Board meeting where I addressed the mayor in regards to the water department corruption exposed at the meeting that night. I also stated during citizens address that I would have a Youtube video posted about how they are billing fraudulently in the water department in Dolton. A week later my water service was terminated

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

There was no shut off notice sent when my water was shut off on 9/25/2019. There was no shut off notice sent on 4/17/2019 when my water was shut off. There was no shut off notice sent on 10/30/2019 when water was shut off. No due process was given on either of the 3 times water was shut off. I was denied discussing my bill because I filed complaints with the proper legal entities, the Attorney General of Illinois, Inspector General Cook County and the FBI Orland Park office. When attempts were made to discuss my bill on 8/22/2019 police were called unwarranted. When I went to discuss my bill and shut off on 9/26/2019 police were called unwarranted and a false police report was filed by Elizabeth Scott. Elizabeth Scott also attempted to get an restraining order which was denied by the Courts in Markham, Illinois. The Village of Dalton police were used to intimidate me on 9/25/2019 and 9/26/2019 in assistance with water shut off through public works and Village of Dalton Administration.

October 30, 2019 water was shut off with the village of Dolton fully aware that I had a billing dispute in which I was overcharged. The Village of Dolton continued to deny me of due process until a court order to discuss my bill by 12/23/2019.

In the meeting with Elizabeth Scott, Sonye London and Janice Johnson. I was denied corrections in billing and was told I would have to pay 1,000.00 that was not owed. In court on 1/16/2020

Village of Dolton Attorney Murphy denied all requests by the judge in regards to the \$1,000.00 request with full knowledge that the Village of Dolton does not give due process.

Termination of water has caused financial hardships because of loss of employment calling in because of water shut-off with no prior notification I have had to drive to my grandmothers to get water or take a shower and also get water from neighbors. I had to buy food from restaurants when I usually cook at home and my home was not able to be clean or sanitary from 10/30/2019 - 1/24/2020

Revised 9/2007

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My minor children and I have suffered skin irritations and body aches from carrying 5 gallon containers of water to our home using (4) 5 gallon containers and (2) 25 gallon containers daily. The Village of Dalton has violated my civil rights and deprivation of rights under color of law. On January 21, 2020 Village of Dalton Board meeting the Mayor Riley Rogers states Shut-off notices have not been sent to residents for 3 years because of postage costs. The Village of Dalton had no right to trespass on my property or shut off water to my residence. Billing from the Village of Dalton clearly states no shut off until after 12/2/2019 but water was shut off three times before that date. The Village of Dalton continues to fraudulently charge for water consumption and deny me of proper billing because of my opposition to the Mayor Riley Rogers, Village Administrator Elizabeth Scott and the corrupt Village of Dalton water department

Revised 9/2007

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The Village of Dolton retaliatory conduct and harassment left me and my two minor children in harms way of fires, unsanitary conditions, and caused irreparable harm and financial hardships. The Village of Dolton wants a trade in regards to proper billing is intentional and fraudulent and without intervention of the court there will be further harm and hardships further fraudulent billing and disregard of civil rights and due process and malfeasance prosecution.

[If you need additional space for ANY section, please attach an additional sheet and reference that section.]

V. Relief:

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

*in overpayments. I would like the court to grant 2,539.06
I would like the court to grant damages in the
amount of 50,000.00 each for Plaintiff and two minor
children a total of 150,000.00. Punitive damages granted
in the amount of 50,000.00 from the Village of Dolton
The illegal shut off without notice has caused hardship from
loss of employment of the petitioner and minor children. Injunctive
relief from Village of Dolton entering property without notice*

VI. The plaintiff demands that the case be tried by a jury. ☐ YES ☒ NO

CERTIFICATION

By signing this Complaint, I certify that the facts stated in this Complaint are true to the best of my knowledge, information and belief. I understand that if this certification is not correct, I may be subject to sanctions by the Court.

Signed this 29 day of January, 2020

Trina L. Downs

(Signature of plaintiff or plaintiffs)

Trina L. Downs

(Print name)

(I.D. Number)

15101 Grant Street, Dolton, IL

60419

(Address)